

Liberty Primary Steel OH&S Response as Supplier – SSA Certification Credit 3.3.



General Instructions

This document has been developed by Liberty Primary Steel as a response to Credit 3.3 Procurement Occupational Health and Safety (OH&S) Assessment from participants of the Steel Sustainability Australia (SSA) Certification Program.

Reference

GFG Alliance Australia

Work Health and Safety Policy

GFG ALLIANCE

Our Objective

GFG Alliance Australia is a family group, committed to achieving world class performance in work health, safety and wellbeing. We will create and maintain a safe and healthy working environment and safety culture. This will be achieved with a goal of 'zero' work-related incidents, injuries or illnesses to workers and visitors to GFG Alliance Australia managed sites, or members of the public in areas that may be directly affected by GFG Alliance Australia.

Consistent with this we will:

- Manage policy implementation, facilitate stakeholder understanding and be committed to continual policy maintenance and improvement.
- Establish and monitor measurable objectives and targets to continually improve health and safety performance. This will take into account evolving community expectations, management practices, scientific knowledge, technology, and business structure.
- Demonstrate due diligence and apply adequate standards that reflect the Company's commitment to workplace health and safety. Demonstrate compliance with applicable health and safety laws, regulations, standards and other relevant requirements.
- Manage risk by implementing systems to identify hazards, assess, control and monitor risk measures, and implement the appropriate mitigating actions, taking into account the variable nature of workplace activities and related health and safety risks.
- Consult with and involve workers in the management of workplace health and safety. This includes the setting of objectives and targets, the development of policies, procedures and systems, and the decision making process regarding the management of risks in the workplace.
- Inform workers and visitors to GFG Alliance Australia managed sites of their obligations regarding this policy. Communicate openly on health and safety matters and disseminate health and safety information to workers and visitors.
- Educate and train managers and workers, to enable them to work safely.
- Assign responsibilities and authorities to individuals, and hold them accountable.
- Monitor and review health and safety management performance and trends. This includes regularly auditing work health and safety management systems, to assess effective implementation and maintenance of this policy. This will assist in identifying and responding to further improvement opportunities.
- Support relevant work health and safety research and initiatives.

Sanjeev Gupta
Executive Chairman
November 2017

Liberty Primary Steel's Response

OH&S Strategic Direction and Governance

Liberty Primary Steel (LPS) is part of the global GFG Alliance. 'Be GFG Safe' is a global safety approach and a rallying cry for everyone to look out for each other because we want our people and all members of the GFG family to be safe, always.

The GFG 'Life Savers' are a connected and integrated component of our global safety strategy – Be GFG Safe. They underpin the strategy's critical incident prevention pillar and help to support the development of an interdependent safety culture and enable our performance. The intent of the GFG Life Savers is to set these minimum behavioural expectations for all of us. The GFG Life Savers reinforce the behaviours we want our people to follow and 'own', so everyone can return home safely at the end of the day.

LPS has four strategic pillars to achieve world-class safety outcomes; Enabling Performance, Critical Incident Prevention, Interdependent Safety Culture and Fit for work & Fit for Life.



OH&S Management Approach

LPS's approach to Occupational Health and Safety (OH&S) management can be summarized as follows:

- **Safety Commitment:** LPS prioritizes the health, safety, and well-being of its employees, contractors, and stakeholders. Safety is deeply ingrained as a core value throughout the organization.
- **Compliance:** LPS diligently complies with all relevant OH&S laws, regulations, and industry standards. It remains updated on the latest legal requirements and takes proactive measures to fulfill its obligations.
- **Risk Assessment and Control:** LPS conducts thorough risk assessments to identify potential workplace hazards and risks. Based on the findings, appropriate control measures are implemented to eliminate or minimize risks to an acceptable level.
- **Training and Education:** LPS recognizes the importance of providing adequate training and education to its workforce. Employees receive the necessary knowledge and skills to perform their tasks safely. Regular training programs are conducted to raise awareness and foster a safety-conscious culture.
- **Incident Reporting and Investigation:** LPS maintains a robust incident reporting system. All incidents, accidents, and near-misses are promptly reported, thoroughly investigated, and analysed. Lessons learned are integrated into the system to prevent future occurrences.

- **Continuous Improvement:** LPS is committed to continually improving its OH&S management system. It actively seeks feedback from employees, conducts internal audits, and implements corrective actions to enhance safety performance.
- **Communication and Consultation:** LPS promotes open communication and consultation with employees and relevant stakeholders regarding OH&S matters. Regular meetings, safety briefings, and forums are conducted to exchange information, address concerns, and encourage a collaborative approach to safety.
- **External Verification:** The LPS safety management system meets the standards set for Self-Insurance and undergoes evaluation using the National Audit Tool (Version 3). As a self-insured organization, LPS possesses the necessary certificates of currency for Self-insurance and undergoes external independent audits conducted by Safe Work South Australia (SWSA). LPS is currently not certified for ISO 45001.

Through this comprehensive approach, LPS demonstrates its unwavering commitment to fostering a safe and healthy work environment for all individuals involved.

OH&S Management Tools

VISIBLE LEADERSHIP

LPS has implemented a Visible Leadership Program (VLP) as part of its ongoing journey towards improving safety practices. The VLP focuses on fostering positive and visible leadership in the field, with senior leaders from LPS actively dedicating time to engage with the workforce. The program aims to achieve the following objectives:

- **Understanding Tasks and Activities:** Leaders seek to gain a thorough understanding of the tasks and activities being performed by the workforce. This enables them to better assess potential risks and identify areas for improvement.
- **Observing and Verifying Safe Systems of Work:** Leaders actively observe and verify that safe systems of work are being applied correctly. This ensures that established safety protocols and procedures are being followed effectively.
- **Confirming Adequate Risk Management Controls:** Leaders assess and confirm the adequacy and effectiveness of risk management controls in place. They ensure that measures to mitigate risks are appropriate and sufficient.
- **Addressing At-Risk Behaviours:** Leaders proactively address any at-risk behaviours or less safe acts they observe. This includes intervening, providing guidance, and reinforcing the importance of adhering to safety protocols.
- **Driving Continual Improvement:** Leaders drive a culture of continual improvement by identifying and promoting opportunities for enhancing safety practices. They encourage feedback from the workforce and actively seek ways to enhance safety performance.

The VLP reflects the genuine care leaders have for the well-being of the people they oversee. Their commitment to health and safety is evident and apparent to others. Leaders set a clear vision for health and safety, taking personal accountability for achieving outcomes. They demonstrate fairness and justice in their approach to safety, ensuring that all individuals are treated equitably.

CHANGE MANAGEMENT

LPS has established a management of change process to effectively handle both temporary and permanent changes in the workplace. This process outlines the specific types of changes that necessitate following the procedure. It assigns roles, responsibilities, and competencies for change management and provides a step-by-step guide on how to initiate, assess, approve, implement, and evaluate the effectiveness of workplace changes.

CONTRACTOR MANAGEMENT

LPS adheres to a comprehensive contractor management process that encompasses various aspects. This process outlines the roles and responsibilities of all parties involved, covers contractor pre-qualification, considers scope and site conditions, addresses risk management, includes health and safety planning, evaluates employee skills and competencies, sets safety targets and key performance indicators (KPIs), incorporates audits and inspections, and considers plant/equipment/material considerations.

TRAINING AND COMPETENCY

LPS has a well-documented training program that outlines the specific health and safety training and competency requirements. Detailed records of health and safety training and competency assessments are diligently maintained. LPS

ensures that workers undergo training and assessments in accordance with the established guidelines for training, verification of competency, and refresher training requirements.

EMERGENCY RESPONSE

LPS has developed an emergency response plan that takes into account potential emergency scenarios and conducts risk assessments for each. The plan encompasses the three crucial phases of emergency management: preparation, response, and recovery. Additionally, it establishes clear criteria for incident/emergency/crisis escalation. Within the plan, specific roles and responsibilities are outlined to ensure an organized and effective response during emergencies.

LIFE SAVERS

The Life Savers have been developed after review of the critical incidents in our business and worldwide fatal incident trends. Over 80% of our critical incidents are covered by these Life Savers. The Life Savers apply to everyone: employees, contractors, service suppliers and visitors. The Life Savers are intended to develop unconscious safety behaviours.

RISK MANAGEMENT

LPS adheres to a documented risk management program and implements the program's stipulations. The risk management processes aim to achieve the following objectives:

- Safeguard the well-being and security of our personnel, third parties, local communities, and the general public, while effectively managing any negative impacts on the environment.
- Effectively manage the risks and their potential effects on operations, finances, reputation, environment and other areas of vulnerability.
- Ensure adherence to legal, regulatory, and other applicable requirements.
- Enhance planning, governance, and decision-making processes.
- Establish a consistent and uniform approach to risk management across the operation.

LPS maintains a risk register that specifically addresses the risks associated with the operations. The risk register undergoes an annual review or is updated promptly in the event of a related incident. Risks are assessed by evaluating both their likelihood and consequences, and appropriate control measures are identified. These control measures are then assigned to the relevant personnel responsible for their implementation.

CRITICAL RISK STANDARDS

Critical risks represent the specific areas in the organisation which, if not adequately managed, could result in a fatality. There is a technical standard for each of these critical risks.

INCIDENT CLASSIFICATION AND PERFORMANCE STANDARD

LPS adheres to the global standard set by GFG for incident classification and reporting. This standard, known as the Incident Classification and Performance Reporting Standard, is based on international standards and recognized by global industry associations. LPS also follows GFG's global standard for incident investigations, ensuring that incidents are thoroughly investigated to prevent future occurrences and encourage knowledge sharing.

At LPS, safety performance is inclusive and does not differentiate between employees and contractors. We combine working hours and incident data for both categories, treating them equally in our safety evaluation and analysis.

AUDITING AND VERIFICATION PROCESSES

LPS are self-insured, and performance of the safety management system is subject to external audits by the state safety regulators.

LPS participate in a corporate assurance program. The program includes verification of general health and safety requirements, compliance to critical risk standards and safety maturity evaluation.

LPS are required to complete self-assessments and critical risk inspections (specific task / activity) to check compliance to standard requirements.

OBJECTIVES AND TARGETS

LPS develop a yearly Balanced Business Plan, inclusive of health, safety and risk objectives, initiatives, and targets aimed at supporting the operation to continue to drive towards achieving the four Be GFG Safe strategic pillars and world-class safety.

LPS specific yearly OHS objectives and targets are developed by the LPS Head of Health, Safety and Risk and endorsed by the LPS Managing Director. The LPS Health, Safety and Risk Team and LPS Departments capture their yearly objectives, initiatives, and targets on their Function / Department specific Plan on a Page (POAP).

The LPS Health, Safety and Risk team and Department managers regularly monitor the implementation of their POAP and provide updates to the LPS lead team, as per business requirements.

Summary table of risks and how they are managed

Type of Risk	Risk Identification	How the risk is managed
Biological	Failure of Health and Hygiene programs to identify and manage at risk employees	Exposure Standards Health Risk Assessment (HRA) and Annual Monitoring Plan Hazardous Substance Procedure Safety Data Sheets Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's Personal Protective Equipment (PPE)
Physical	Failure or absence of adequate Electrical controls resulting in unintended electrical incident occurring	Electrical Licencing Permit to Work Compliance to technical standard requirements <ul style="list-style-type: none"> • ST-7-681 Electrical Safety Standard • ST-7-680 Electric Arc Flash Safety Standard • ST-7-400 Isolation - Lockout Tagout Verification Standard Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's
Physical	Failure or absence of Isolation Controls	Electrical Licencing Permit to Work Compliance to technical standard requirements <ul style="list-style-type: none"> • ST-7-681 Electrical Safety Standard • ST-7-400 Isolation - Lockout Tagout Verification Standard Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's
Physical	Failure or absence of Mobile Equipment controls	Compliance to technical standard requirements <ul style="list-style-type: none"> • ST-7-388 Mobile Equipment and Pedestrian Safety Standard • ST-7-404 Road Transport Safety Standard Critical Risk Management – Road Transport Mobile equipment operator licencing Mobile equipment standard requirements - lights, reverse beeper, safety cage etc Traffic Management Plans Speed Management Fatigue Management Load Restraint requirements (load restraint guidelines) Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's
Physical	Failure or absence of Lifting controls	Compliance to technical standard requirements: <ul style="list-style-type: none"> • ST-7-431 Lifting Operations Standard • ST-7-870 Crane Integrity and Safe Access Standard Critical risk Management for lifting operations, crane integrity and safe access Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's Exclusion zones Crane integrity and safe access (PTPI Inspections)
Physical	Inability of Emergency Response to safely deliver required services	Contract - FSA - 2022-WHY-OMS-MESO and Security - LPS & SIMEC-0189 WI29.600 Service Provider Safe System of Work (Rev 5) Emergency Response Risk Assessment QP29.07 (Rev 24) Major Emergency and Crisis Management Plan QP29.ERT.001 Structural Fire Response (Rev 0)

Physical	Failure or absence of Molten Metal controls	Compliance to technical standard requirements: <ul style="list-style-type: none"> • ST-7-679-Hot and Molten Material Safety Standard Critical Risk Management – Molten Metal Process Control Access Control to molten metal production areas (interlock gates) Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's Personal Protective Equipment (PPE)
Physical	Failure or absence of Machine controls	Compliance to technical standard requirements Critical risk Management – Lockout, Tagout Verification (Isolation) standard and procedures Isolation – Personal protection Machine Guarding Standards AS/NZS 4024 Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's Personal Protective Equipment (PPE)
Psychosocial	Failure to identify and respond to employee / workforce Psychosocial hazards	Policy and Procedures Training and Awareness Intervention protocols including by-stander awareness Reportable conduct process Employee assistance program
Physical	Workers on site are not Fit for Work	Policy and Procedures Fitness for Work - Alcohol and Other Drugs Procedure Fitness for Work - Fatigue Training and Awareness
Physical	Failure of Structure	Defect Testing Visual Inspection Program Treatment Plans
Physical	Failure or absence of Working at Heights controls	Compliance to GFG technical standard requirements <ul style="list-style-type: none"> • ST-7-405 Working at Height Standard Critical risk Management – Working at Height Permit to work including working at heights assessment Fall Prevention / Protection Systems Safe work instructions / Safe Systems of Work - JSEA, SWMS, PRA's Personal Protective Equipment (PPE)